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JR

April 23, 1999

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

Re: United Telephone Company  
IntraLATA Toll Dialing Parity Plan

Dear Mr. Waddell:

99-00314

Enclosed is an original and thirteen (13) copies of the proposed IntraLATA Toll Dialing Parity Plan for United Telephone Company. Also enclosed is a check for the \$25 filing fee as required by the Tennessee Regulatory Authority. This filing is the formal documentation to the information which was faxed to your office on April 22, 1999.

Please note in Section I. of the attached Plan that this filing does not waive United's Rights under §251(f)(2) of the Telecommunications Act of 1966 related to this filing.

Please feel free to contact me at 931/364-4322, if you should have any questions regarding the enclosures.

Sincerely,

Herbert R. Bivens  
General Manager

Enclosures

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EXECUTIVE SECRETARY

**Intralata**  
**Toll Dialing Parity Plan**

99-00314

**United Telephone Company**  
**Chapel Hill, Tennessee**

**April 22, 1999**

## **I. INTRALATA TOLL DIALING PARITY**

### **A. PURPOSE**

1. United Telephone Company (United) has described herein the process for implementing Intralata Toll Dialing Parity in its exchanges located in the State of Tennessee. The intent of this Plan is to provide a proposal that, upon implementation, would provide customers the ability to select the telecommunications carrier of their choice for routing their intraLATA toll calls.

### **B. INTRALATA ENVIRONMENT**

1. United's customers can currently dial seven digits to complete local exchange or intraLATA toll calls. The scheduled date for implementation of toll dialing parity should not change this dialing pattern. After upgrading switch technology and software configurations, seven-digit dialed numbers that are intraLATA toll calls should be prefixed with the area code before being transmitted to the carrier. This prefixing should allow carriers to receive a seven-digit dialed intraLATA toll number as a complete ten digit number.
2. In 1995, toll-free intraLATA county-wide calling was initiated for United via an order from the Tennessee Public Service Commission. United currently maintains tax code billing tables to identify "free county-wide" intraLATA toll calls originated by its intraLATA toll customers and to ensure that billing does not occur on these calls. United will continue to process toll-free intraLATA county-wide calls in this manner for its intraLATA toll customers after implementation of intraLATA toll dialing.

### **C. IMPLEMENTATION SCHEDULE**

1. United will offer dialing parity for IntraLATA toll in all of its exchanges by July 22, 1999.

### **D. CARRIER SELECTION PROCEDURES**

1. United will implement the full 2-PIC (Primary Interexchange Carrier) carrier selection methodology. With the full 2-PIC methodology, customers will be able to presubscribe to one telecommunications carrier for interLATA toll calls and presubscribe to the same or a different participating telecommunications carrier, including their existing local exchange company, for all intraLATA toll calls. Orders for changes will be accepted and processed beginning on the implementation date.
2. United's employees who communicate with the public, accept customer orders, and serve in customer service capacities will be trained to explain the process to customers for making PIC changes for intralata toll calls. Business Office personnel will be prepared to make changes in customer records based upon requests from customers or carriers and direct customers to their chosen intraLATA carriers. Processes will be in place to provide new customers with an opportunity to choose their intraLATA toll carrier from a list of available carriers.

### **Existing Customers**

1. Currently, the LEC is the intraLATA toll provider for existing customers in United's local exchange area. On the date in which intraLATA toll presubscription is implemented, customers may presubscribe to any telecommunications carrier offering intraLATA toll service in their exchange. The LEC will be the designated carrier for local long distance calling until the customer affirmatively chooses an intraLATA toll carrier. Customers may make this selection through their own initiative or as a result of the promotional marketing activities of participating intraLATA toll telecommunications carriers. Customers may communicate their choice of carriers directly to United, as their local exchange service provider, through the local Business Office or indirectly through their selected carriers.
2. Customers will be assessed a cost-based PIC change charge per United's tariff for changing their intraLATA carrier. When customers request a change in their interLATA and intraLATA carriers during one contact with the Business Office and choose the same carrier for both jurisdictions, only one charge will be assessed. When customers request a change in their interLATA and intraLATA carriers during one contact with the Business Office and choose different carriers for each jurisdiction, two charges will be assessed.
3. For a waiver period of 90 days from implementation, customers will not be assessed an intraLATA PIC change charge for their initial intraLATA toll carrier choice. Only the interLATA charge will be assessed when the intraLATA and interLATA carriers are changed to different carriers during one contact with the Business Office during the waiver period.
4. A charge will be established for "slamming" or unauthorized PIC changes submitted for end-user customers. United will be subject to the rules related to slamming as indicated in Tennessee Regulatory Authority Rule 1220-4-2-.56, Sections (2)-(6). (Section (1) defines the manner in which IXCs should confirm PIC change information prior to submitting the information to LECs. Because United is a LEC, the communication of information in the manner defined would not be applicable.)

### **New Installation Customers**

1. Customers who contact United requesting new telephone exchange service are currently being provided a list of telecommunications carriers available to provide interLATA toll service. Upon implementation of intraLATA toll presubscription, the customer will be provided a second list of carriers, including United, that provide intraLATA toll service in their exchange. The list of intraLATA toll carriers will be presented in a competitively neutral manner. Customers who do not make a positive choice for an intraLATA toll carrier will be identified within United's system as a "no PIC" and will not be automatically defaulted to a carrier. Customers identified as "no-PIC" within United's systems will be required to dial 10XXX to place intraLATA toll calls until they make an affirmative choice for an intraLATA toll carrier.

### **E. CUSTOMER EDUCATION/NOTIFICATION**

1. Customers will receive information explaining their opportunity to select an intraLATA carrier a minimum of 30 days in advance of the offering of intraLATA toll dialing parity via a bill message. In addition, during the 30 days following implementation of intraLATA Dialing Parity, customers will receive a bill insert also explaining their opportunity to select an intraLATA carrier. United anticipates that promotional strategies by carriers will contribute to customer awareness of intraLATA toll dialing parity. Customer telephone directories will be updated as new editions are published to reflect the opportunity for customers to choose an intraLATA toll carrier.

## **F. CARRIER NOTIFICATION**

1. Current interexchange carriers will be notified of United's intraLATA toll dialing parity implementation via letter approximately 90 days in advance of the proposed implementation date. Carriers should provide a list of exchanges in which they plan to offer intraLATA toll service at least 60 days in advance of United's implementation date. United needs notification in advance to include the carrier on the list of participating carriers in each United exchange. Certified carriers who enter the market after implementation will be added to the list of participating carriers within 30 days of notifying United.
2. United will provide subscriber listing information to carriers in "readily accessible" tape or electronic formats in a timely manner as requested through the processes that currently exist for the interLATA market. The process includes subscriber listing updates to carriers for new customers who choose that carrier or for existing customers of a carrier who revise their subscriber listing information. In addition, carriers can obtain complete subscriber listings in several formats. The provision of this information is in compliance with FCC Order No. 96-333, Paragraph 389.
3. United will comply with Part 51, Sections 305, 307, 325, 327, 329, 331, 333 and 335 of the FCC Order in providing the required information and notice to the public of network changes. United plans to file a public notice with the FCC, with possible migration of the notice to the Internet process as described in Section 329. The notice will include network information as outlined in Section 327. The notice will be provided within the timeframes described in Sections 331-333.

## **G. ACCESS TO OPERATOR SERVICES AND DIRECTORY ASSISTANCE**

1. Access to Operator Services and Directory Assistance will continue to be available through the customer's local exchange carrier or interLATA carrier. No industry standard has been established for access to Operator Services and Directory Assistance unique to the intraLATA carrier. For Operator Services, customers dial "0" to reach their local exchange operator and "00" to reach their interLATA operator. For Directory Assistance, customers dial "1-411" for accessing the local exchange Directory Assistance and customers dial "1-NPA-555-1212" for accessing their interLATA carrier's Directory Assistance.
2. The local and interLATA Operator Services and Directory Assistance may be branded by the local and interLATA carriers, as appropriate, based on the dialing pattern of the end user. Since no unique intraLATA dialing pattern currently exists in the industry, United is not capable of identifying intraLATA calls to United's local or the IXC's interLATA operators or directory assistance representatives. As such, this procedure is considered in compliance with FCC Order No. 96-333, Rule 51-217(d).

## **H. COST RECOVERY**

United will file approval with the TRA, an Equal Access Impact Recovery Plan that will be developed and implemented in coordination with IntraLATA Presubscription.

## **I. RIGHTS UNDER §251(f)(2) OF THE TELECOMMUNICATIONS ACT OF 1996**

The filing of this plan does not preclude United Telephone from exercising any of its rights to Suspension or Modification under §251(f)(2) of the Telecommunications Act of 1996.